

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

MICHAEL OLIVER,

Plaintiff,

CASE NO. 20-cv-12711  
HON. LAURIE J MICHELSON

v.

DONALD BUSSA, In his  
individual and official capacity,  
and CITY OF DETROIT,  
Jointly and Severally,

Defendants,

---

DAVID A. ROBINSON (P 38754)  
ROBINSON & ASSOCIATES, P.C.  
Attorney for Plaintiff  
28145 Greenfield Rd., Suite 100  
Southfield, MI 48076  
(248) 423-7234  
[davidrobinsonlaw@gmail.com](mailto:davidrobinsonlaw@gmail.com)

---

PATRICK M CUNNINGHAM (P67643)  
CITY OF DETROIT LAW DEPARTMENT  
Attorneys for Defendant City of Detroit  
2 Woodward Avenue, Suite 500  
Detroit, MI 48226  
(313) 237-5032  
[cunninghamp@detroitmi.gov](mailto:cunninghamp@detroitmi.gov)

---

THOMAS E. KUHN (P37924)  
Co-Counsel for Plaintiff  
1595 Pebble Point Drive  
Troy, MI 48085  
313.974-6605; fax 313.963.9061  
[tekuhn@aol.com](mailto:tekuhn@aol.com)

---

**EX PARTE MOTION FOR LEAVE TO FILE**  
**EXHIBIT #8 IN THE TRADITIONAL MANNER**

NOW COMES the Plaintiff, and pursuant to the Electronic Filing Policies and Procedures, seeks leave of this Court to file exhibit (8) in the traditional manner.

The exhibit will be used in support of Plaintiff's Response and Brief In Opposition To Defendants' Motion for Summary Judgment (ECF 43, PageID.438), and cannot be authentically converted to electronic form for the following reason as it contains audio/video files. The exhibit is as follows:

**1. *Exhibit 8- Video Of the Crime In Progress***

For the foregoing reasons, the Plaintiff respectfully requests that this Court grant the leave sought in this motion.

Respectfully submitted,

/s/ David A. Robinson  
DAVID A. ROBINSON (P38754)  
THOMAS E. KUHN (P37924)  
BRANDON MCNEAL (P81300)  
Attorneys for Plaintiff  
28145 Greenfield Rd, Suite 100  
Southfield, Michigan 48076  
[davidrobinsonlaw@gmail.com](mailto:davidrobinsonlaw@gmail.com)

Dated: April 13, 2023

**CERTIFICATE OF SERVICE**

I hereby certify that on April 13, 2023, I electronically filed the foregoing document and accompanying exhibits with the Clerk of the Court using the ECF system, which will send notification of such filing to all attorneys of record.

By: /s/ David A. Robinson

Dated: April 13, 2023